May 8, 2012
Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, NW
Washington, D.C. 20554

Re: Ex Parte Notice, WT Docket 11-69, ET Docket No. 09-234

Dear Ms. Dortch:

PowerTrunk, Inc. ("PowerTrunk") submits the following clarifying comments regarding PowerTrunk's Digital LMR (D-LMR) equipment. Specifically, PowerTrunk would like to take this opportunity to address the technology used by PowerTrunk and the applicability of the Commission's rules to PowerTrunk's D-LMR equipment in view of the recent filings in this docket.

In its most recent filing, Harris Corporation ("Harris") has changed gears and now appears to concede that a change in Commission rules would be required to achieve its desired result of precluding the use of PowerTrunk's equipment.[1] However no such rule change is needed and would, in fact, disserve the public interest. Although Harris explained that its request for rule change is motivated by a fear of interference, Harris' repeated distortion of the record confirms that the driving force behind Harris' filings is in reality a fear of competition and represents an unfair attempt to promote its proprietary equipment to the exclusion of other better suited technologies.

For example, we note that the term "low power", a definition never coined nor used by PowerTrunk, has been used extensively by Harris[2] to mislead the public and potential end users[3] to believe that Part 90 compliance was obtained by lowering the power of the transmitter. However, PowerTrunk's D-LMR equipment received type acceptance certification from the Commission, in full compliance with Part 90 rules. Part 90 compliance was accomplished through PowerTrunk's

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[1] See *Ex Parte* Notice, Harris Corporation, WT Docket 11-69, ET Docket No. 09-234 (May 7, 2012) and Petition for Rulemaking, Harris Corporation, WT Docket 11-69, ET Docket No. 09-234 (May 1, 2012)("Petition").

[2] See *Ex Parte* Notices, Harris Corporation, WT Docket 11-69, ET Docket No. 09-234 (March 16, 2012; March 27, 2012; April 4, 2012, April 10, 2012 and May 7, 2012) and Petition for Rulemaking, WT Docket 11-69, ET Docket No. 09-234 (May 1, 2012).

[3] In its filing, the Association of Public-Safety Communications Officials- International (APCO), used the term "low power" to refer to a type of "TETRA" equipment that APCO and others claim should not be authorized due to alleged interference. See *Ex Parte* Notice, APCO, WT Docket 11-69, ET Docket No. 09-234 (March 27, 2012).

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modification of one of the TETRA standard's modulation parameters, as described in more detail in its *Ex Parte* filing dated March 23, 2012, and as recognized by the Commission in its April 26, 2011 Waiver Order.[4] The modifications made to the modulation scheme have nothing to do with the power of the transmitter. No matter what acceptable level of RF power is used, PowerTrunk's D-LMR equipment would be found compliant with the rules. For example, PowerTrunk's 75 watt Base Station Repeater was certificated in full compliance with Part 90 rules. Disregarding PowerTrunk's clarification that its equipment cannot be considered "low power", Harris continues to purposely use the term "low power" in an attempt to disparage PowerTrunk's equipment, and the continuing use of such terminology is indicative of Harris' improper motives.

Notwithstanding Harris' Petition to change the Commission's rules, Harris presses its argument that the Waiver Order and Order on Clarification restrict the operation of PowerTrunk's equipment.[5] As a result, it appears that some filers misunderstand that because PowerTrunk's D-LMR is interoperable with TETRA equipment, it must operate and be treated the same as TETRA. However, PowerTrunk's D-LMR equipment is NOT TETRA as the Commission defines the term,[6] and indeed does NOT meet the entirety of the ETSI standard. For example, PowerTrunk's D-LMR equipment has a designator of 20K0D7W. ETSI standard "TETRA" has an emission designator of 22K0D7W. This is also clear from the lab reports and equipment certification for PowerTrunk's equipment. PowerTrunk's D-LMR equipment has been type accepted by the Commission in full compliance with the same rules which are used to certificate Harris's, Motorola's, and any other LMR Part-90-compliant equipment. The fact that PowerTrunk's equipment is TETRA-interoperable does not mean that it would cause the interference that has been suggested with the use of TETRA equipment.

Consistent with this position, the TETRA + Critical Communications Association made clear in its March 29 filing that "... by 'TETRA' the TCCA means the ETSI standard for which the FCC has provided entry into the U.S. marketplace via a waiver grant." As recognized by TCCA, PowerTrunk's equipment is not the subject of the waivers granted in favor of "TETRA" (i.e. non-Part-90-compliant) equipment.

With respect to type certification, the FCC's rules are intended, among other purposes, to properly define the acceptable levels of radiated RF power on the adjacent channels for each portion of the radio spectrum. For example, Rule 90.210 identifies the specific emission masks which must be satisfied to ensure there is no adjacent channel potentially harmful interference outside of the

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[4] Amendment to Part 90 of the Commission's Rules to Permit Terrestrial Trunked Radio (TETRA) Technology, *Notice of Proposed Rulemaking and Order,* WT Docket No. 11-69, ET Docket No. 09-234, 26 FCC Rcd 6503 (2011) ("Waiver Order"), FN. 14.

[5] Petition for Rulemaking, FN. 12, Harris Corporation, WT Docket 11-69, ET Docket No. 09-234 (May 1, 2012).

[6] "TETRA is a spectrally efficient digital technology with the potential to provide valuable benefits to land mobile radio users. It does not, however, conform to all of our Part 90 technical rules." Waiver Order at 6503 ¶ 1.

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mask. If equipment is certified compliant with the FCC's rules, and if it is operated in accordance with those rules, there is no basis to attack the equipment as potentially causing harmful interference. In the present case, PowerTrunk's D-LMR equipment is fully compliant with Part 90 of the FCC's Rules, as evidenced by the type certifications referenced in its *Ex Parte* filing of March 23.

Notwithstanding PowerTrunk's type certification of its equipment, Harris has repeatedly raised the issue of potential interference based on its interpretation of the Commission's rules for the purpose of advancing its proprietary technology to the exclusion of others. While Harris has previously taken the position that the Commission rules "in effect require all digitally modulated waveforms to adhere to the more stringent H-Mask"[7], Harris now appears to concede that a change in the Commission rules would be required to impose the H-Mask. Harris' position that Mask B cannot be used for certification of digital equipment is a transparent attempt to block the use of competing technology and lacks merit.

Harris' position is contrary to the decision made by the Commission during the certification of PowerTrunk's D-LMR equipment for use under Part 90 of the rules. For example, on July 14, 2010, Teltronic (the parent of PowerTrunk) wrote to Mr. Joe Dichoso, the Equipment Authorization Branch Chief at the FCC, questioning an informal staff view that the equipment might require certification under Mask C. PowerTrunk explained that the digital equipment needed to comply with Mask B because it contains an audio low pass filter (Ex. A), and it provided the schematics for its equipment showing the location of the filter. In his response, Mr. Dichoso agreed, after consulting with the FCC's Wireless Bureau, that it was appropriate to certify the digital equipment using Mask B because it has an audio low pass filter. (Ex. B)[8]. Thus, Harris' position that all digitally modulated waveforms are required to adhere to the more stringent H-Mask is not supported by FCC rules or practice, and its assertion that the Commission should change its rules so that only Mask H be used to certify digitally modified waveforms is a transparent attempt to encourage the Commission to erect roadblocks that would unfairly give Harris' Mask H certified equipment an unfair advantage over its competitors. Specifically, Harris' assertion of interference which could allegedly be caused by PowerTrunk equipment is merely speculative as it is not supported by any field-observed evidence. Therefore, Harris' Petition to the Commission to change its rules to ban legitimately certificated equipment (PowerTrunk's) is groundless as it is not based on evidence of an actual case of interference. Tellingly, Harris' "fear" of interference only arose after an adverse procurement decision.

Once equipment has been type certified by the FCC, it has traditionally been the role of the Regional Planning Committee ("RPC") to coordinate the use of frequencies to avoid interference among systems. None of the filers have identified why the RPCs are unable to perform this same function with respect to PowerTrunk's type certified D-LMR equipment. Specifically, the example

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[7] See *Ex Parte* Notice, Harris Corporation, WT Docket 11-69, ET Docket No. 09-234 (March 27, 2011).

[8] Although the equipment being certified operates in the 450-470 MHz range, the rationale underlying the FCC's decision applies equally to the 800 MHz spectrum as audio filtering is not dependent on the RF frequency band.

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provided by Harris in its Petition confirms that Harris's OpenSky 4-slot TDMA would also cause the same "interference" that Harris fears if deployed in the vicinity of other systems as its declared emission level (-46 dBc) is much higher than the maximum allowed to keep the adjacent channels unaffected. However, because factors other than emitted power must be considered when evaluating potential interference, the RPC takes into account how distant the neighboring systems are and what antenna systems are used to concentrate the RF power in a given geographical area during the RPC planning process. Therefore, although Harris' equipment requires frequency coordination by the RPC in order to avoid potential interference when deployed, Harris urges the Commission to preempt the RPC's role when it comes to PowerTrunk's equipment by implementing new rules to specifically block competitors' equipment.

In its *Ex Parte* filing of April 2, 2012, Harris seemingly acknowledges that, although it is aware of other high-capacity 4-slot TDMA technologies that are safely in operation pursuant to Commission rules today for voice communications, it is not able to identify such capabilities offered for data transfer other than PowerTrunk's D-LMR technology. The use of the voice-centric technology advocated by Harris for data transmissions would result in the need to use more channels which effectively would result in reducing the voice and data capacities of the systems operating on public safety frequencies by one half. For example, attempting to implement advanced data intensive applications (for example, state-of the-art AVL) using Harris' 4-slot TDMA OpenSky-based network design would require using more channels to achieve the same performance as PowerTrunk D-LMR equipment. Thus, Harris urges the Commission to adopt rules which would benefit a less spectrum-efficient technology over more spectrum-efficient designs which through proper frequency coordination can fully meet end-users' increasing demand for advanced data features without an increase in potential interference. Harris ignores the fact that the need to coordinate a greater number of frequency blocks for a less spectrally efficient network, as would be required for an OpenSky-based network to get similar functionality to what PowerTrunk equipment offers, presents its own challenges to an RPC. If accepted, Harris' proposal would contribute to either increasing spectrum congestion or to preventing end-users from selecting equipment based on the data throughput and voice traffic needs as determined by each end-user in a competitive environment.

Based on the foregoing, PowerTrunk respectfully submits that Harris' Petition requesting a change in Commission rules, in fact, confirms that PowerTrunk's equipment is in full compliance with the Commission's rules and that the thrust of the current rulemaking is to establish rules for ETSI standard TETRA equipment, i.e. the equipment that is the subject of the Waiver Orders -- not Part 90-compliant equipment like PowerTrunk's. Moreover, the rule changes sought by Harris would disserve the public interest, and thus the Commission should deny the Harris request. We hope that the above explanation helps bring some clarity to the confusion that we believe is being injected into the rulemaking process by Harris and repeated by others.

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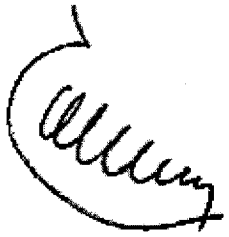
We thank the Commission for its consideration of these comments.

Respectfully submitted,



Jose. M. Martin
Executive Vice President & Chief Operating Officer

Enclosures

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EXHIBIT A

teltronic

FEDERAL COMMUNICATIONS COMMISION
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Attention: Mr. Joe Dichoso (Equipment Authorization Branch Chief)
C.C.: Mr. Rashmi Doshi (Chief of the Laboratory Division)

July 14, 2010

Re: Inquiry number 955470

Dear Mr. Dichoso,

First of all, I hope that you are the correct person to whom to address for this issue. If not, I would greatly appreciate it if you would forward this inquiry to the appropriate office and/or indicate back to us who we should contact.

My name is Jose Roman, and I represent the company Teltronic S.A.U. in Spain and its US subsidiary, PowerTrunk Inc., for certification issues for our products.

With respect to KDB Inquiry nº 955470, I have a few questions in order to try to understand the reasons why the issue remains unresolved despite the information submitted to FCC by the test laboratory TIMCO which handled the certification process for us.

- In April 2010, TIMCO Engineering Inc. sent to the FCC all the necessary information, together with the corresponding test report, in order to obtain the grant for our HTT-500 digital radio. TIMCO sent to Teltronic the provisional grant on 14 April 2010, with FCC Identifier WT7PTRKTHTT500410. (See attached annex: 226AUT10_GRANT)
- On 25 May 2010, Teltronic received notification from the FCC that our application was dismissed. The reason stated by the FCC is that "The test report does not show compliance with the appropriate Mask C." (See attached annex: FCC letter to Teltronic, dated 11 May 2010)
- Teltronic prepared a document in response to this notification which was presented to the FCC on 7 June through TIMCO. This document explains the reasons why our equipment should be considered to comply with Mask B. It describes the low pass audio filter of the HTT-500 and the modulation characteristics of the equipment. In the same document we also explain that the equipment tested is not a standard TETRA device, but rather one which has been modified in order to comply with FCC regulations. (See attached annex: Letter_to_TIMCO&FCC_100604ed0500)

Given the above situation, we wish to make the following points:

1. The HTT-500, which is the object for this certification, is a digital radio based on TETRA technology, but which has been modified in order to comply with FCC rules; in particular, for FCC Part 2.1049(c), "Occupied Bandwidth". The modification consists of a change in the RCC (root raised cosine) filter. Specifically, the roll-off factor applied is 0.2 instead of 0.35 as used by standard TETRA equipment.

   With this modification the HTT-500 complies with FCC rules as demonstrated in the test report by TIMCO. (See attached annex: 226AUT10TestReport_Rev4)

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teltronic S.A. Unipersonal

2. Teltronic is not aware of any restriction applicable to its product to impede certification of the HTT-500. We therefore do not understand why when complying with the established FCC rules for this type of equipment that we cannot obtain the grant. We request that FCC confirm to us whether any such restriction exists.

3. A waiver request has been presented by the TETRA Association to allow the use of standard TETRA technology in the USA (see attached annex: FCC Public Notice, ref. DA 09-2633, released December 24, 2009), given that TETRA technology as specified by the original ETSI standard does not comply with all established FCC requirements. Teltronic understands that this waiver request is a process completely independent from the certification of the HTT-500 since we have already stated that it is not a standard TETRA device and since it does comply with FCC rules for this type of equipment.

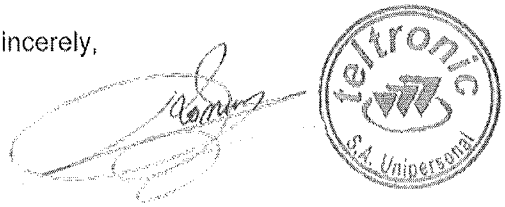
   We would like to know if FCC is associating the two processes together, and if so, if the waiver request is acting as an obstacle to certification of the HTT-500. It would be very interesting to Teltronic for the FCC to state its opinion about this issue, as well as indications as to how this problem could be resolved.

4. Teltronic would like to know if the argument presented in its reply to the FCC concerning the application of Mask B (see attached Letter_to TIMCO&FCC_100604ed0500), in which the situation is completely described, is correct. If this is not correct, then we would like to know exactly the position of the FCC on this point and what would be the solution.

5. We appreciate if you would please indicate to us how we should proceed in order to reach a satisfactory solution to certification in the shortest amount of time possible, given that the negative impact of a prolonged unresolved situation is inhibiting the business development activity of our US subsidiary, PowerTrunk Inc.

Thank you for your kind attention on this matter, and we look forward to your soonest response.

Sincerely,



Jose Román Gimeno
Certifications & Services Area Manager
Teltronic S.A.U.

Attachments:
- FCC letter to Teltronic, dated 11 May 2010
- 226AUT10_GRANT. Provisional Grant.
- Letter_to_TIMCO&FCC_100604ed0500. Reply to FCC.
- 226AUT10TestReport_Rev4. Test report.
- FCC Public Notice, ref. DA 09-2633, released December 24, 2009

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EXHIBIT B

From: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov]
Sent: Wednesday, July 28, 2010 12:39 PM
To: Jose Roman
Cc: Tim Maguire; Laura Martinez; Alfredo Calderon; Joe Dichoso
Subject: RE: INQUIRY NUMBER 955470

Hello Jose,
We have confirmed with the Wireless Bureau. Yes, you can apply the Mask B to this device with an audio low pass filter.
Regards,
Joe

From: Jose Roman [mailto:j-roman@teltronic.es]
Sent: Wednesday, July 28, 2010 10:32 AM
To: Joe Dichoso
Cc: Tim Maguire; 'Laura Martinez'; 'Alfredo Calderon'
Subject: RE: INQUIRY NUMBER 955470

Dear Joe,

I enclose the required plots.

Could you say me if you need any additional documentation?

I await your answer.

Best regards

Jose Roman

-----Mensaje original-----
De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov]
Enviado el: martes, 27 de julio de 2010 21:51
Para: Jose Roman
CC: Tim Maguire; Laura Martinez; Alfredo Calderon; Joe Dichoso
Asunto: RE: INQUIRY NUMBER 955470

Hello Jose,
Please provide an occupied bandwidth plot showing compliance with the 20 kHz bandwidth requirement in the table of 90.209.
Thanks

-----Original Message-----
From: Jose Roman [mailto:j-roman@teltronic.es]

Sent: Tuesday, July 27, 2010 11:51 AM
To: Joe Dichoso
Cc: Tim Maguire; 'Laura Martinez'; 'Alfredo Calderon'
Subject: RE: INQUIRY NUMBER 955470
Importance: High

Dear Joe,

We would like to know if the information provided yesterday related to the audio low pass filter is enough to justify the application of Mask B to our equipment (HTT-500).

Could you give us an answer today?

I am sorry, but we don't know what else to do for clarifying this misunderstanding. We think we have provided all the required information to solve this formal process and to apply for the FCC Grant.

Best regards.

Jose Roman.

-----Mensaje original-----
De: Jose Roman [mailto:j-roman@teltronic.es]
Enviado el: lunes, 26 de julio de 2010 21:21
Para: 'Joe Dichoso'
CC: 'Tim Maguire'; 'Laura Martinez'; 'Alfredo Calderon'
Asunto: RE: INQUIRY NUMBER 955470

Dear Joe,

Yes, we can measure the frequency response of the audio low pass filter. The attached plot is the real response measured by our engineers.

If you need we could explain to you how we can measure it.

Best regards
Jose Roman

-----Mensaje original-----
De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov] Enviado el: lunes, 26 de julio de 2010 20:29
Para: José Román
CC: Tim Maguire; Laura Martinez
Asunto: RE: INQUIRY NUMBER 955470

So you are able to measure the audio low pass filter by itself within the IC and the data is attached?

-----Original Message-----
From: José Román [mailto:j-roman@teltronic.es]
Sent: Friday, July 23, 2010 11:50 AM
To: Joe Dichoso
Cc: Tim Maguire; 'Laura Martinez'
Subject: RE: INQUIRY NUMBER 955470

Dear Joe,

Let me to explain you.

In our first letter to FCC ("Letter_to_TIMCOFCC_100604ed0500") we explained that the audio low pass filter is wholly contained in the audio processing IC (STMicroelectronics STw5093). As the filter is contained within the IC, from the outside of the HTT-500 cannot get the frequency response of this filter alone. It is that we tried to explain in this letter.

For this reason, we included in this first letter the frequency response of this filter included in the datasheet of the Integrated Circuit (table in page 2 of the letter). This response is supplied directly by the manufacturer of this IC. We thought that this information was sufficient to show that the equipment had a low pass filter and to show the frequency response of this filter.

In your response to TIMCO on 07/19/2010, you require us the plot of this low pass filter. For this reason, we have measured directly the frequency response of this filter, using our knowledge of our equipment. This plot was measured directly over the IC

Therefore the attached plot is the true frequency response of our filter.

I hope that this explanation will be sufficient for your understanding of the low pass filter.

Anyway, I can arrange a conference call with our engineers for solving all your doubts. I think it could be very interesting in order to clarify the problem. We will be available on next Monday at anytime.

If you have any doubt, don't hesitate to contact with me.

Thanks in advance.

Best regards

Jose Roman

-----Mensaje original-----
De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov] Enviado el: viernes, 23 de julio de 2010 15:05
Para: José Román
CC: Tim Maguire; Laura Martinez
Asunto: RE: INQUIRY NUMBER 955470

Hello Jose,

Please clarify. This was the response when the data was first asked for. It says that the audio low pass filter isn't available. We need the test data for the audio low pass filter. It appears that you are resubmitting some other low pass filter data.
Thanks,

Joe

---Reply from Customer on 07/09/2010---

Yes there is a pending petition for conentional TETRA radio but conventional TETRA using a standard industry 0.35 raised cosine filter factor does not meet the requirements and a TETRA using a RC filter with a 0.2 factor does. There are currently other certificated TETRA radios (see Sepura grantee code XX6). As to the technical question of the response of the audio low pass filter, the audio low pass filter is wholly contained in the audio processing IC and as such isn't available externally to measure and plot but tabulated data on the low pass filter is included in the technical brief is a chart (see chart labeled STW5093) from the IC manufacturer's data sheet.

-----Original Message-----
From: José Román [mailto:j-roman@teltronic.es]
Sent: Thu 7/22/2010 11:58 AM
To: Joe Dichoso
Cc: Tim Maguire; Laura Martinez
Subject: RE: INQUIRY NUMBER 955470

Dear Joe,

Yesterday we sent to TIMCO the audio low pass filter response, with a little explanation. Anyway, data of this low pass filter is contain in the letter that I sent you last week and in the test report.

I attach the response that I sent to TIMCO

Plot with measured frequency response for audio low pass filter is attached according to FCC requirement 2.1047(a). See "Frequency Response for Audio Low Pass Filter (STw5093 STMicrolectronic codec).pdf"

This filter is contained in the audio signal processing IC, which is STw5093 STMicroelectronic Codec.

Frequency range from 100Hz to 5KHz is shown in the plot as specified in 2.1047(a)

This issue has already been indicated as a table from manufacturer(STMicroelectronic) in both "Letter_to_TIMCO&FCC_100604ed0500" (page 2) and "226AUT10TestReport_Rev4" Section "Audio Low Pass Filter - VOICE MODULATED COMMUNICATION EQUIPMENT" (page 19).

I hope that this information will be sufficient for you. Please, if you need any additional information, don't hesitate to require me.

I would like to manage this inquiry directly with you, without any intermediary, in order to avoid misunderstanding.

I await your answer.

Best regards.

Jose Roman

De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov] Enviado el: jueves, 22 de julio de 2010 16:43
Para: José Román
CC: Tim Maguire
Asunto: RE: INQUIRY NUMBER 955470

Hello Jose,

It is up to you how you want to handle the inquiry. To clarify, it was proposed to use Mask B instead of Mask C. Mask B is for devices with an audio low pass filter. Section 2.1047 requires appropriate data for devices with and audio low pass filter. However, you said that it cannot be supplied. If this data cannot be supplied, a waiver is needed.

Thanks,
Joe

From: José Román [mailto:j-roman@teltronic.es]
Sent: Thursday, July 22, 2010 3:05 AM
To: Joe Dichoso
Subject: RE: INQUIRY NUMBER 955470
Importance: High

Dear Joe,

We apologize for the inconvenience caused, but I would like that you explain me the present situation.

When Teltronic receive the inquiry we tried to solve through TIMCO, but the inquiry remained without solution. For this reason, Teltronic contacted directly with you, in order to manage the problem directly with FCC.

I am worried because we don't understand the reasons why this problem still isn't solved.

Yesterday, I spoke with TIMCO, and TIMCO had received a notification for FCC that said:

"The data is required per 2.1047. If the data is not submitted, approval of a waiver is needed."

As you say in your previous e-mail, I understand that it is the response of FCC to TELTRONIC letter that I sent to you last week. Could you confirm me it?

In this case, If you will be so kind, I would like that you indicate me the appropriate way to solve this problem. Should we continue to manage through TIMCO? Or Can we manage directly with you?

Thanks in advance.

Best regards.

José Román Gimeno (j-roman@teltronic.es)

Certifications & Services Area Manager / Jefe Area de Certificaciones y

Servicios

R&D Dept./ Dpto. I+D

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De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov] Enviado el: miércoles, 21 de julio de 2010 17:26
Para: José Román
Asunto: RE: INQUIRY NUMBER 955470

You need to check with the person/test lab who submitted the inquiry.

From: José Román [mailto:j-roman@teltronic.es]
Sent: Wednesday, July 21, 2010 11:15 AM
To: Joe Dichoso
Subject: RE: INQUIRY NUMBER 955470

Dear Joe,

I have introduced the KDB inquiry number (955470) in the OET KDB, but there isn't any response.

Do I need to use another KDB inquiry number?

I am worried for this issue.

Thanks in advance.

Best regards.

José Román Gimeno (j-roman@teltronic.es)

Certifications & Services Area Manager / Jefe Area de Certificaciones y Servicios

R&D Dept./ Dpto. I+D

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De: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov] Enviado el: lunes, 19 de julio de 2010 19:18
Para: José Román
CC: Rashmi Doshi; Alfredo Calderon; Diane Poole
Asunto: RE: INQUIRY NUMBER 955470

Jose,

We will be sending you a response via the KDB.

Thanks,

Joe

From: José Román [mailto:j-roman@teltronic.es]
Sent: Wednesday, July 14, 2010 2:55 PM
To: Joe Dichoso
Cc: Rashmi Doshi; 'Alfredo Calderon'
Subject: INQUIRY NUMBER 955470

Dear Mr. Dichoso

My name is Jose Roman, and I represent the company Teltronic S.A.U. in Spain and its US subsidiary, PowerTrunk Inc., for certification issues for our products.

I would like to clarify some issues respect to the KDB Inquiry nº 955470.

I attach a letter with our explanation and doubts about this inquiry (Please see the document "Letter to FCC_100714"). Also I include other annexed documents to facilitate your understanding of the letter.

We look forward to your soon response. Don't hesitate to contact with me if you have any doubt.

Sincerely

José Román Gimeno (j-roman@teltronic.es)

Certifications & Services Area Manager / Jefe Area de Certificaciones y Servicios

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